

General Order #2-1A: *Bias Reduction*

Background Notes to the Sample Directive

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Introduction

The 2002 session of the Virginia General Assembly expanded the compulsory training standards for basic training and re-certification of law enforcement officers to include sensitivity and cultural diversity. Specifically, DCJS must "publish and disseminate a model policy or guideline that may be used by state and local agencies to ensure that law enforcement personnel are sensitive to and aware of cultural diversity and the potential for biased policing." To fulfill the legislative requirement, these background notes accompany a new sample directive on bias reduction, General Order #2-1.A. Governor Warner convened an Advisory Committee on Bias-Based Policing, a broad constituency including citizens of many racial, ethnic, and professional backgrounds. Between November, 2002, and April, 2003, the Advisory Committee met at the Richmond Police Academy to develop a new training curriculum and policy guidelines. This document and the sample directive that accompanies it, General Order 2-1A, Bias Reduction, are products of the intensive work of the Advisory Committee, reflecting diverse viewpoints. The consensus within the Advisory Committee is that these policy documents represent the best way to address bias reduction in Virginia law enforcement.

The leadership of the Virginia Sheriffs' Association, the Virginia Association of Chiefs of Police, the Virginia State Police Association, the Virginia Coalition of Police and Deputies, and the State Lodge of the Fraternal Order of Police have endorsed the legislative mandates for training and policy. Governor Warner has expressed hopes that the training and policy guidelines will help end racial profiling by promoting the "best practices" of the profession.

The Department of Criminal Justice Services (DCJS) has been long involved in improving Virginia's criminal justice system not only through the establishment of training and certification standards but also through numerous training programs, the statewide accreditation program for law enforcement agencies, and the promotion of written administrative guidance. To this end, DCJS created a generic manual of orders on key enforcement topics now known as the *Sample Directives for Virginia Law Enforcement Agencies*. Orders from this manual have found widespread adoption throughout Virginia, suitably modified to address local concerns. General Order 2-1A will become part of this manual.

DCJS has committed its resources to reducing and, where possible, eliminating bias in enforcement decisions. Bias severs the trust of a community, threatens the integrity of the law enforcement profession, and inequitably applies the machinery of law. Sample directive General Order #2-1A aims to help agencies consider the contexts within which bias occurs, and shapes good judgment by emphasizing accountability, supervision, leadership, and training.

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Nature of Bias

Bias refers to prejudice or partiality because of preconceived ideas, a person's upbringing, culture, experience, and education. Everyone holds biases. Law enforcement officers, however, must recognize that bias may play a role in selecting which citizens to stop, interview, or detain. The officer, then, may exhibit bias in constructing a profile which includes race or some other personal characteristic in the absence of a specific description of a suspect. The sample directive that accompanies this document recognizes that bias exists within all kinds of enforcement decisions (or decisions *not* to take enforcement action), not just traffic stops or field interviews. The policy suggestions made in this document aim to reduce the presence of bias in all contacts with citizens.

When bias becomes a filter for determining which citizens to stop, when, under what circumstances, and what action to take, then bias has become a substitute for critical judgment. Critics claim that the reliance on second-hand information erodes an understanding and application of reasonable or articulable suspicion, the legal basis for detaining citizens in order to resolve ambiguity. If officers do not use specific, articulable reasons for stopping citizens, then the community becomes alienated from law enforcement officers for stopping people with no apparent justification.

Most law enforcement agencies are trying to promote guidance on vehicle stops by stressing their legal basis and instructing on methods for making stops and interviewing drivers. Some agencies are beginning to collect data on why citizens are stopped, for how long, for what reasons, and to document any subsequent searches or arrests. Importantly, agencies are examining the use of profiles and trying to determine if their traffic stop practices are discriminatory.¹ Profiles may be official or unofficial. Profiles may be vaguely understood and based on hearsay, or narrowly defined based on documentation. The key issue behind unreasonable or unlawful profiling, however, is bias. Like everyone else, law enforcement officers carry many biases. If enforcement actions are determined by biases, however, then biases must be identified and eliminated from decision-making. Biases in law enforcement may lead to unreasonable or unlawful arrests and detention. Biases may lead to violence.

Definitions

Discussions of bias in law enforcement involve the use of terms such as ethnicity, race, sex, or gender. Some people use these terms interchangeably. These terms, however, have distinct meanings. *Ethnicity* refers to a cluster of characteristics which may include race but also cultural characteristics or traits which are shared by a group with a common experience or history. *Race* is a category of people based on common physical or genetic traits or characteristics. As distinct from ethnicity, race only refers to physical characteristics sufficiently

¹ For instance, 16 of the country's 49 state law-enforcement agencies require officers on traffic patrol to record the race of the persons stopped. Another 23 of these agencies require some collection of race and ethnicity data in some situations. See *Traffic Stop Data Collection Policies for State Police, 2001*, Bureau of Justice Statistics Fact Sheet, December 2001 (NCJ 191158).

distinctive to group people under a classification. The notion of race began as an effort to distinguish physical types in an overall classification scheme for humankind, but the concept has not retained a single meaning or significance over time. *Sex* refers to a biological classification, male or female, based on physical and genetic characteristics. Many people use *gender* as synonymous with sex, but gender, unlike sex, is a psychological classification based on cultural characteristics or traits.

Many people see bias as indistinguishable from "profiling." Criminal profiling based on sound reasonable suspicion has been upheld by the courts and constitutes a legitimate enforcement practice. It is important to distinguish between profiling and bias in law enforcement. Profiling usually refers to a practice of identifying possible criminals based on a set of characteristics. The term "profile" comes from the "war on drugs," the intensified enforcement of federal and local drug laws over the years. Profiling may have begun with the Drug Enforcement Agency (DEA) during the 1970s. DEA compiled many characteristics of drug traffickers from criminal cases into a model or profile of behaviors commonly found among traffickers. As discussed below, however, constitutional safeguards limit the utility of profiles. An officer who stops and detains African-Americans, for example, may be acting wrongly on a biased profile that includes race as a very general indicator of wrongdoing, rather than making stops that arise from an articulable reasonable suspicion. "Driving while black" is one form of biased policing based on a broad profile. For example, a New York police department recently entered into a consent decree (the first between a local jurisdiction and state government) to make major changes in police performance following the identification of a pattern or practice of sexually harassing women, or "driving while female."²

Profiling and the Law

The aspects of profiling that have raised the most public concern involve an officer's bias in making enforcement decisions based on the characteristics of race, sex, or ethnicity. The thoughtfully constructed profile eliminates bias by using characteristics with a demonstrable relationship to crime. Profiles usually but not always address drug trafficking. Violent incidents at schools such as the Columbine shootings have led to the creation of profiles to identify potentially violent students. These school profiles, however, have had little preventive value. The violent students who have been studied showed significant differences and even some general similarities that may not have been part of a profile. Since September, 2001, both law enforcement agencies and the courts have examined the utility of profiles to detect threats involving violent acts for religious or political purposes.

Federal and Virginia courts, however, have been cautious about the legitimacy and application of profiles. A characteristic used in one profile, for instance, may not apply in another instance. In one profile, the suspect's *not* looking at the officer was considered suspicious, whereas in another case an officer stated that he became suspicious when the suspect looked at the him. In one case the suspect's nervousness was considered a suspicious

² Discussed in "In the blind spot: study says growing problem of 'driving while female' isn't on agencies' radar," *Law Enforcement News*, June 30, 2002.

characteristic but in another case the suspect's calm aroused the officer's suspicion. In these cases, officers seem to be relying on hunches without having any clear suspicion of criminality. The danger is that officers may begin to rely on broad profiles rather than articulate elements of reasonable suspicion to justify searches of stopped citizens. If race is added to the profile, the danger is that the elements of the profile become a self-fulfilling prophecy. If an officer thinks that all drug suspects are black, then he or she will only notice potential black suspects. Criminal profiling has been common because the courts have affirmed the legitimacy of the law enforcement use of the "totality of circumstances" as a key criterion for stopping citizens. The problem, however, is that reliance on the totality of circumstances might mean a lack of articulable, specific reasons: the totality of circumstances might include everything, especially race.

Law enforcement managers agree that the inclusion of race or any other personal characteristic in a profile is wrong unless officers have a specific description of a suspect that includes the suspect's race. The legal basis for stopping citizens and asking about their business is *reasonable suspicion*. This standard allows officers to detain citizens briefly to clear up apparent suspicious activities or behavior. The standard for arresting a citizen and taking him or her into custody is probable cause. *Probable cause*, a higher standard, consists of facts, or apparent facts and circumstances that might lead an experienced officer to suspect that criminal activity was in-progress and that the person arrested has committed a crime. Probable cause allows searches of persons and property, seizures of property, and, of course, arrests.

The courts have generally supported the use of profiles although they have insisted that reasonable, articulable suspicion remain the legal basis for a stop. One important case on drug-courier profiling, *United States v. Sokolow*,³ held that the Fourth Amendment does not preclude "'probabilistic' behaviors which include the 'personal characteristics' of drug couriers" as a basis for defining reasonable suspicion.⁴ Nevertheless, *Sokolow* reminded law enforcement that any short investigative stop requires "some minimal level of objective justification." When the courts examine profiles, they apply the rules of reasonable suspicion and evaluate the facts and circumstances known to the officer at the time of the encounter. For years, officers have been taught that reasonable suspicion is more than a mere hunch, that the evidence available to the officer at the time of the encounter with a citizen supersedes any post-incident second-guessing, and that the totality of the circumstances must be evaluated. With these elements in mind, one law enforcement professional defines the use of profiles as:

nothing more than evaluating conduct, characteristics, and circumstances in a given situation and forming reasonable inferences from them by trained and experienced

³ 109 S.Ct.1581 (1989).

⁴ The Fourth Amendment of the Bill of Rights states that the "right of people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."

officers as consistent with patterns observed during previous successful investigations.⁵

The most comprehensive definitions of profiling can be found in the texts of consent decrees, findings by courts that law enforcement agencies have used race-based profiles. The excerpt below comes from a decree based on a finding that law enforcement officers of an Illinois community had made numerous stops of African-Americans based on a very generalized, vague profile of drug users and traffickers that did not meet a reasonable suspicion definition. According to the decree, *racial* profiling is:

the consideration by an officer, in any fashion or to any degree, of the race or ethnicity of any civilian in deciding whether to surveil, stop, detain, interrogate, request consent to search, or search any civilian; except when officers are seeking to detain, apprehend or otherwise be on the lookout for a specific suspect sought in connection with a specific crime who has been identified or described, in part, by race or ethnicity and the officer relies, in part, on race or ethnicity in determining whether reasonable suspicion exists that a given individual is the person being sought.⁶

The most important Virginia case concerning profiles forbids the use of race or national origin in drug-trafficking profiles unless these characteristics are used to describe a specific suspect. In *Lowery v. Commonwealth*⁷ an officer stopped a Florida rental car (with Florida license plates) in Virginia. The officer suspected that the car was stolen because the rental company did not usually allow rentals to be taken beyond Florida. Further, the officer employed a drug-courier profile which included an African-American or Hispanic driver, a rental car, and an out-of-state license plate. While the Virginia Court of Appeals found that the stop was justified based on the officer's suspicions, it held that the inclusion of the driver's race in the profile was wrong. The use of race among other characteristics (which constituted reasonable suspicion), according to the court, violated the Virginia Constitution, "the right to be free from government discrimination upon the basis of . . . race." Earlier Virginia cases have taken a similar view. One case defined a profile in drug-courier cases as "an informally compiled abstract of characteristics thought typical of persons carrying illicit drugs".⁸ Articulate, reasonable suspicion, then, is still a requirement to justify Fourth Amendment intrusions. In line with federal court decisions, another Virginia appellate decision has emphasized the two elements necessary to permit a stop based on a profile: the judgment or assessment of the officer must be based on the totality of circumstances, and the judgment or assessment must show a particularized or articulable suspicion.⁹

⁵ From *The Role of Law Enforcement in Search and Seizure Warrant Actions*, by Kevin J. Perry, Department of Criminal Justice Services, 1995, p. 38.

⁶ From *Michael Ledford, Jr., Karen Ledford v. City of Highland Park*, U.S. District Court for the Northern District of Illinois Eastern Division, August 2, 2000.

⁷ 9 Va.App. 314; 388 S.E.2d 265 (1990); 6 VLR 1187.

⁸ From *Iglesias v. Commonwealth*, 7 Va.App.93, 372 S.E.2d 170 (1988).

⁹ *Castaneda v. Commonwealth*, 7 Va.App. 574, 376 S.E.2d 82 (1989).

In recent years, law enforcement officers have been encouraged to exercise aggressive patrol tactics to identify and stop drug trafficking. Recently, the Supreme Court decided an important case on the expanded search/seizure prerogatives of law enforcement officers concerning pretextual traffic stops. *Pretextual* refers to the officer's pretext for making a stop. An officer might stop a car on suspicion of drug trafficking, but tell the driver that the stop was made for a traffic violation. As a general principle, without a warrant at any traffic stop an officer can request a driver's license and vehicle registration, order the driver and passengers to leave the vehicle, and, in an arrest, search the interior of the vehicle and all closed containers found within. With the driver's consent the officer can search the entire vehicle. The 1996 Supreme Court decision in *United States v. Whren*¹⁰ affirmed that officers can stop vehicles to allay any suspicions even though the officers have no evidence of criminal behavior. The *Whren* case held that the officer's subjective intent (pretext) is irrelevant when stopping a vehicle; the legitimacy of the stop will be gauged by its objective reasonableness. In other words, as long as officers have at least one legal reason for stopping a vehicle (such as a minor traffic violation), then it is irrelevant that they had some suspicion unrelated to the traffic stop. According to the Supreme Court, "Subjective intentions play no role in ordinary, probable-cause Fourth Amendment analysis." This case places law enforcement agencies under great pressure to have policies regarding stops of citizens that are free of bias, fair, and relate to legitimate enforcement objectives.

What Is Policy?

The term "policy" generally refers to any guidance provided by the law enforcement manager to employees: policy, therefore, can include both written and oral orders. By developing and mandating policy, the manager sets a performance standard for employees. In the absence of written policy, department policy becomes whatever officers are actually doing: what they do and how they do it is policy, regardless of what the manager says it is. In civil litigation, the courts maintain that law enforcement practices not supported by directives constitute the effective policy of the department.

The development of sound, written policy occupies one key component of proper police management: the other two "affirmative links," to borrow the language of the courts, are supervision and training. All law enforcement managers--whether they supervise a department of two or two thousand employees--must give careful, continuous attention to developing sound policy, and train and supervise employees accordingly. Civil cases against law enforcement agencies scrutinize and judge practices and procedures according to written department policy, or oral policy if the written component is absent.

Some law enforcement administrators believe that they are better off *not* formulating written policy, but instead proclaim the unwritten, oral version whenever their practices are scrutinized. Risk managers and liability experts universally recommend against this view, and

¹⁰ 116 S.Ct. 1769.

instead hold that managers must develop written policy and use it for on-going training and supervision. In the courts, liability has been found for agencies with inadequate or unconstitutional policies or practices. The courts always examine the behavior of officers: what they do is what counts, not what managers say they do through written orders. DCJS recommends that law enforcement agencies not only develop a comprehensive manual of written orders, addressing routine and critical tasks, but also reinforce orders through periodic training and audits of both supervisors and line personnel. The importance of a solid, current orders manual cannot be overstated: virtually every major Supreme Court ruling that governs arrests, pursuits, or searches and seizures was based on an analysis of policy *versus* custom (defined as a "persistent, widespread practice", or oral policy). Managers, therefore, must shape, manage, and encourage the discretion of officers through written policy.

In DCJS training on creating written orders, the term "policy" is given a specific meaning. A compilation of written orders is termed "written administrative guidance." Written administrative guidance consists of three kinds of statements. Each type of statement varies in scope, intent, and applicability. Most agencies' orders contain *policies*, which give broad guidance of a philosophical nature, sometimes articulated as mission statements; *rules*, or orders restricting or prohibiting behavior, with little deviation permitted; and *procedures*, or "how-to" orders in which the agency outlines the preferred method of performing a task. DCJS sample directives include all three types. Agencies need to ensure that personnel understand the three types because orders shape and determine their discretion in making decisions and judgments. A rule allows no discretion; a procedure provides the agency-authorized way of handling a situation but still allows discretion when circumstances require.

The best written guidance on biased policing imposes *repeated* requirements to exercise enforcement duties according to constitutional guidelines. Orders, however, only serve the agency's and the community's interests when supported by on-going training and proper supervision and discipline. The behavior of law enforcement officers is managed through sound written guidance, training (including training in directives), and supervision according to the directives. If any one of these three elements fails or is not present, then all three fail. If proper training on directives does not exist or supervision is inadequate, then any written directives are useless.

Managers best serve officers in the field by closely observing and assessing field practices, shaping them through written directives, and enforcing them continuously by training and supervision. Bias is best eliminated by comprehensive, on-going training in constitutional safeguards, backed by attentive and informed supervision. Recognizing the need for a broad approach to eliminating race-based profiles, the Virginia Association of Chiefs of Police adopted the following resolution on August 16, 2000:

The Virginia Association of Chiefs of Police urges all law enforcement agencies to utilize professionally accepted guidelines when developing strategies for crime control, traffic law enforcement and vehicle stops . . . all Virginia law enforcement agencies are urged to continue to examine their policies and procedures, their mission and value statements, training programs, field supervision, evaluation of citizen complaints and

other efforts to ensure that racial or ethnic based traffic stops are not being employed within their agencies and that all citizens are treated with the utmost courtesy and respect when they encounter Virginia law enforcement officers.

Accreditation Standards for Reducing Bias

The standards of the Virginia Law Enforcement Professional Standards Commission (VLEPSC) encourage anti-bias practices and directives. VLEPSC represents an accreditation program in which local law enforcement agencies submit to voluntary inspection by peers among Virginia's law enforcement managers. The inspection matches an agency's directives and practices according to standards devised by a board comprised of police chiefs and sheriffs.

To quote a national accreditation program, through "accreditation, law enforcement agencies at the state, county, municipal or local level gain objective testimony that they meet professional criteria," a statement that applies to VLEPSC. To achieve accreditation, an agency must demonstrate compliance with many standards and renew its standing every five years. The process produces intensive analysis and refinement of an agency's goals, objectives, and methods. Compliance with accreditation is not mandatory. Even if an agency does not participate in accreditation, the standards nevertheless reflect state-of-the-art management thinking.

Effective July, 2002, VLEPSC introduced the following standard:

- ADM.02.07 A written directive prohibits officers from engaging in bias-based policing. This directive will include:
- a. a definition of bias-based policing;
 - b. a requirement that all sworn employees receive initial and on-going training in proactive enforcement tactics, to include cultural diversity, courtesy and interpersonal communications skills; and,
 - c. a requirement that all complaints of bias-based policing shall be thoroughly investigated through the agency's internal affairs process.

Commentary: Agencies must avoid practices that undermine public trust, such as "racial profiling," if they are to strive for maximum effectiveness. A comprehensive "racial profiling" policy and related training provides officers with the knowledge needed to avoid unwarranted accusations. The policy should include direction based on reasonable and articulable suspicion.

Training in Directives

The ideal method of developing and training in written administrative guidance is within

the scope of any agency's capabilities, even with few officers. Written administrative guidance must be developed for each enforcement task for which a consistent field approach is necessary. Critical tasks, those carrying a risk of threat to officers, civil liability, or which concern a matter of great public interest should be addressed in orders that are formally reviewed at least annually within the agency. First, the manager may draft, with the aid of staff, an agency order. If the agency is small, each officer can review and comment on the order by a deadline. In larger agencies, the manager might rely on a committee with both sworn and nonsworn personnel, including field officers. Based on the comments and criticisms, the manager would revise the order and issue it, following higher review by a town manager or city/county attorney, if appropriate. After the order has been revised and the manager issues it, training in directives must take place. Many agencies do not provide in-house instruction on orders and merely issue them with the requirement that personnel sign forms that they have received and understand the order. These forms amount to nothing more than a receipt for a piece of property, the order itself. In-house training is necessary to forge the link between directives and supervision to ensure that orders will actually guide behavior.

The first echelon of training occurs between the manager and mid- or first-line supervisors. Supervisors should come to the training with questions, concerns, and comments, all of which receive discussion. The manager uses the training session to convey to supervisors the meaning and intent behind the order. The second echelon of training occurs between supervisors and line personnel. Only after the first echelon of training can supervisors truly represent and speak for management. Ideally, each supervisor works from the same outline which requests subordinates to read the order by a scheduled date and attend a session at which they can ask questions or raise concerns. At the training the supervisor, using the outline, asks questions of subordinates based on the new order, requiring them to look through the order to find the correct answers. The outline guides supervisors in points to emphasize, includes questions to ask subordinates, and poses issues to discuss with suggested "what if" questions. By providing supervisors with a training outline in the orders manual, managers communicate the importance of written directives and engender a uniform approach to training. Each such session should be documented as part of a training record in agency directives. Critical task orders should be issued for a year followed by a formal review. During that time, periodic meetings might take place to discuss the order, giving the manager the opportunity to convey his or her intent and meaning, and allowing officers to pose "what-ifs" for discussion and analysis. These sessions may be short--fifteen to thirty minutes--but ought to be documented as training sessions.

Resources

Note: Contact DCJS (Crime Prevention and Law Enforcement Services) if you have difficulty locating the following resources. Also, note that Internet web addresses may change.

General:

Jack E. Call, "Drug Courier Profiles," *Virginia Police Chief*, Autumn, 1994.

Kevin J. Strom, Peter Brien, Steven Smith, "Traffic Stop Data Collection Policies for State Police, 2001," Bureau of Justice Statistics *Fact Sheet*, December, 2001. To obtain a copy, call the BJS Clearinghouse at 1-800-732-3277, or visit the BJS web site at <http://www.ojp.usdoj.gov/bjs>.

David A. Harris, "The Stories, the Statistics, and the Law; Why 'Driving While Black' Matters," *Minnesota Law Review*, vol. 84, no. 2, December, 1999.

"Cincinnati Police Reform Agreements Reached," by G. Flint Taylor, *Police Misconduct and Civil Rights Law Report*, vol. 7, no. 3, May-June, 2002. This article concerns the agreements between the City of Cincinnati, ACLU, Fraternal Order of Police, Black United Front, and U. S. Department of Justice to address race-related grievances against police.

The following articles from the *FBI Law Enforcement Bulletin*, some of which may be available through the FBI web site:
<<http://www.fbi.gov/>>

"The Role of Race in Law Enforcement: Racial Profiling or Legitimate Use?" by Richard G. Schott, November, 2001.

"Investigative Detention, How Long is Too Long?", by Jayme S. Walker, August, 1999.

"Search Incident to Arrest, Another Look," by Thomas D. Colbridge, May, 1999.

"Investigative Detention, Constitutional Constraints on Police Use of Force," by John C. Hall, May, 1998.

"Pretext Traffic Stops, *Whren v. United States*," by John C. Hall, November, 1996.

"Consent Searches, Guidelines for Officers," by Kimberly A. Crawford, August, 1996.

Web links:

International Association of Chiefs of Police:

<<http://www.theiacp.org/pubinfo/pubs/samplestopspolicy.htm>>
IACP Sample Professional Traffic Stops Policy and Procedure

<<http://www.theiacp.org/pubinfo/pubs/racialprofilingtext.htm>>

"Policies Help Gain Public Trust: Guidance from the IACP Highway Safety Committee," excerpted from the July 2000 *Police Chief* magazine

National Organization of Black Law Enforcement Executives:

Ronald L. Davis, "Racial Profiling: 'What Does the Data Mean?' A Practitioner's Guide to Understanding Data Collection & Analysis," National Organization of Black Law Enforcement Executives, 2001. Text is available at:

<<http://www.noblenatl.org/pdf/2-12%20Data%20Collection.PDF>>

NOBLE also provides training in cultural diversity, community partnerships. Examine NOBLE's web site at <<http://www.noblenatl.org>>.

Americans for Effective Law Enforcement:

<<http://www.aele.org/hotissues.html>>

AELE's web site contains links to many sample directives from various states and organizations.

Police Executive Research Forum:

<<http://www.policeforum.org/>>

The PERF research publication, *Racially Biased Policing: A Principled Response* by Lorie A. Fridell, Robert Lunney, Drew Diamond, and Bruce Kubu, can be accessed on-line at:

<<http://policeforum.org/racial.html>>. The portion of the study that analyzes policy can be found at: <<http://www.policeforum.org/racial.html#4>>

DCJS Sample Directives for Virginia Law Enforcement Agencies:

<<http://www.dcjs.org/cple/sampleDirectives/>>

Virginia Law Enforcement Professional Standards Commission:

<<http://www.dcjs.state.va.us/accred/>>

Other:

<<http://www.aclu.org/store/amazon/police.html>>

Information on a book by Kenneth Meeks, *Driving While Black*, Broadway Books, 2000

<<http://www.aclu.org/profiling/report/index.html>>

David A. Harris, "Driving While Black: Racial Profiling on Our Nation's Highways," an ACLU Special Report, June 1999.

<http://www.ndol.org/ndol_ci.cfm?kaid=119&subid=156&contentid=523> John D. Cohen, Janet J. Lennon, and Robert Wasserman, "Eliminating Racial Profiling," a report of the Democratic Leadership Council's Progressive Policy Institute.

Various consent decrees, correspondence, and legal documents pertaining to racial profiling can be found at the web site of the U.S. Department of Justice. Here is a sample:

<<http://www.usdoj.gov/crt/split/documents/columbus.htm>>

<<http://www.usdoj.gov/crt/split/documents/columbuscomp.htm>>

<<http://www.usdoj.gov/crt/split/documents/polmis.htm>>

<<http://www.usdoj.gov/crt/split/documents/pittspdfind.htm>>

<<http://www.usdoj.gov/crt/split/documents/steubencomp.htm>>

<<http://www.usdoj.gov/crt/split/documents/jerseycomp.htm>>

<<http://www.usdoj.gov/crt/split/documents/jerseysa.htm>>

Notes